

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

DECLARATION OF JASMINE EVANS

Jasmine Evans declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. My name is Jasmine Evans. I am one of the Plaintiffs in this action (formerly known as “Jane Doe”).
2. I make this declaration in support of Plaintiffs’ Motion for Class Certification.
3. I am a Black resident of Buffalo, where I have lived my entire life.
4. I work as a medical assistant.
5. I have been through approximately ten BPD Checkpoints in Buffalo’s East Side.
6. During a Checkpoint I encountered on July 2, 2015, I received four tickets: three for seatbelt violations for myself and my children (which I disputed), and one for driving with a learner’s permit.
7. On a separate occasion BPD impounded my car at a Checkpoint because the person driving it had a suspended license.

8. I believe BPD engages in discriminatory practices. I observed that Checkpoints occurred in predominantly Black areas, in Buffalo's East Side. In addition, during Checkpoint stops BPD officers degrading me and treated me like I was a criminal because I am Black.

9. The BPD Checkpoints disrupted my daily routines. Simple activities like driving to and from work, picking my kids up from school, and driving to the grocery store made me feel I was being treated like a criminal because Checkpoints subjected me to police searches and questioning. I felt degraded and discriminated against because the Checkpoints were set up in Black neighborhoods and because BPD officers were disrespectful in how they spoke to me during the Checkpoint stops.

10. I drive regularly in the City of Buffalo and plan to continue to do so.

11. I understand that this case is a proposed class action.

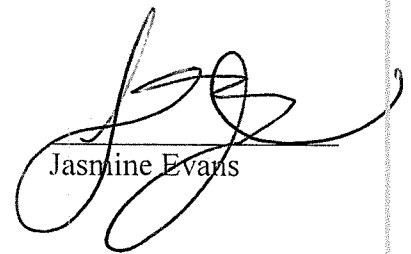
12. I am willing to serve as a representative for the Checkpoint and Traffic Enforcement Classes on behalf of myself and other people whose facts and circumstances are similar to mine. I understand that the I understand that the Checkpoint Class is seeking monetary damages and the Traffic Enforcement Class is seeking a court order declaring the City of Buffalo's traffic enforcement practices unlawful and ordering the City to change its practices.

13. I understand that as a class representative, I have a responsibility to participate actively in the litigation. I am represented in this lawsuit by lawyers from the National Center for Law and Economic Justice, the Center for Constitutional Rights, the Western New York Law Center, and Covington & Burling LLP. Since joining this lawsuit, I have communicated regularly with my counsel, kept informed of the progress of the case, reviewed and approved the Complaint and Amended Complaint (primarily the paragraphs that describe my experiences),

participated in written discovery, sat for a deposition and talked with my counsel about what I think a fair resolution of this case would be.

14. I understand that as a class representative I have a responsibility to protect the interests of the entire class, not just my own interests, and to ensure that my counsel prosecutes the case vigorously and in the interest of all class members. I agree to fulfill my responsibilities as a class representative.

Dated: May 21, 2024



Jasmine Evans